



**REMOVAL IS TIMELY**

4. Plaintiff's Petition was served upon Defendant on September 27, 2019. This Notice of Removal is filed within thirty (30) days of Defendant's receipt of Plaintiff's Petition, and is thus timely filed under 28 U.S.C. § 1446(b).

**FEDERAL QUESTION**

5. According to Plaintiff's Petition, this is an action for alleged violations of the Fair Debt Collection Practices Act, 15 U.S.C. §1692, *et seq.* ("FDCPA").

6. Under FDCPA § 1692k(d), this Court has original federal question subject matter jurisdiction of this action without regard to the amount in controversy. In addition, this action arises under the laws of the United States, specifically the FDCPA. Therefore, this Court has subject matter jurisdiction under 28 U.S.C. § 1331. Accordingly, this action may be removed to this Court, as provided by 28 U.S.C. 1441(a) and (c)(1)(A).

**FILING OF REMOVAL PAPERS**

7. Under 28 U.S.C. § 1446(d), written notice of the removal of this action has been given simultaneously to Plaintiff's counsel, and a Notice to Clerk of Removal has been simultaneously filed with the Circuit Court of the City of St. Louis, State of Missouri.

WHEREFORE, Defendant Amcol Systems, Inc. does hereby remove the above captioned action from the Circuit Court of the City of St. Louis, State of Missouri and requests that further proceedings be conducted in this Court as provided by law.

Respectfully submitted,

**AMCOL SYSTEMS, LLC**

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on October 1, 2019, a true copy of the foregoing was served upon the party below by the federal court's CM/ECF:

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